

The Northeast Georgia Regional Commission (NEGRC) has completed its review of the following Development of Regional Impact (DRI). This report contains the NEGRC’s assessment of how the proposed project relates to the policies, programs, and projects articulated in the Regional Plan and Regional Resource Plan. Also included is an assessment of likely interjurisdictional impacts resulting from the proposed development, as well as all comments received from identified affected parties and others during the fifteen-day comment period.

The materials presented in this report are purely advisory and under no circumstances should be considered as binding or infringing upon the host jurisdiction’s right to determine for itself the appropriateness of development within its boundaries.

Transmittal of this DRI report officially completes the DRI process. The submitting local government may proceed with whatever final official actions it deems appropriate regarding the proposed project, but it is encouraged to take the materials presented in the DRI report into consideration when rendering its decision.

Project I.D.:	DRI #3541
Name of Project:	Horseshoe Bend
Name of Host Jurisdiction:	Barrow County

Background

The developer’s request for a rezoning from Barrow County initiated the DRI review. The site would be rezoned from R-3 to R-3 MPD (Master Planned Development). Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 2/18/22—3/5/22.

Proposed Development

LGI Homes-Georgia LLC is proposing construction of 590 homes on a 325-acre site along Mulberry Road in unincorporated Barrow County (parcel number: XX056 009A). Additionally, the project would construct 13 stormwater detention ponds and an amenity center. The project would be completed in one phase with an estimated completion date in 2028. Currently, the site is undeveloped with a combination of woods and open fields.

Compatibility with Existing Plans

The site is identified as “Suburban Neighborhood” on the Barrow County Comprehensive Plan’s Future Development Guide Map (dated 9/14/2018). This Character Area intends to preserve established neighborhoods and create new residential development that is consistent with surrounding suburban densities. Future development is supposed to be consistent with single-family homes at low to moderate densities (max 1-2.3 du/acre). High quality building materials, tree cover maintenance, and open space are desired features. R-1 and R-2 zoning are considered appropriate for the area. Neither the current zoning nor the proposed zoning is consistent with the Plan’s desired zoning categories for the area. However, the proposal’s density is 1.8 du/acre which is consistent with the Plan’s density recommendations. No renderings or designs were submitted for this review (not required), so it cannot be determined whether the quality of the

building materials is consistent with the Plan. The applicant states that 35% of the site would be covered in impervious surfaces, but makes no mention of tree cover maintenance nor open space percentages; no landscaping or open space is identified on the submitted site plan. The basic proposal of single-family houses at 1.8 du/acre is consistent with the Comprehensive Plan, but it cannot be determined whether the development is consistent with the quality and character of development the Plan calls for.

The site is identified as “Developing” on the Northeast Georgia Regional Plan’s Regional Land Use Map (dated 6/7/2018). The Regional Plan recommends development that matches the region’s workforce, prices in the lifecycle cost of infrastructure, creates a sense of place, builds a compact development pattern on existing infrastructure, creates diverse and affordable housing, and compliments existing and planned transportation options—especially non-automobile transportation modes. The site plan shows a suburban development pattern that does not meet these recommendations. At less than two dwelling units per acre, the proposal creates the sprawling, automobile-dependent development pattern that the Regional Plan recommends avoiding. This kind of development pattern has been shown to create fiscally unsustainable maintenance liabilities. The proposal also fails to create a sense of place. There is no central green, plaza, or gathering place that can serve as a value-creating landmark for the neighborhood. The proposed amenity center could serve as part of a central greenspace, but it is not well-connected to the rest of the neighborhood, and many residents would need to drive to access it. For a project that covers 325 acres, a village block design with houses organized around central parks and greens would be more effective at creating a sense of place, building longevity into the project. The Regional Plan recommends building a variety of housing types at varying price points, but this project only delivers detached single-family houses—one of the most expensive types of housing. Incorporating “Missing Middle Housing” types like duplexes, fourplexes, mansion apartments, accessory dwelling units, and/or townhomes are recommended for a project of this scale. The project is also located in a relatively isolated part of Barrow County, and this will almost certainly lead to automobile-dependency. Children and others who cannot drive will have virtually no access to destinations outside the subdivision without someone to drive them around. Even the amenity center is built around the automobile. At the least, the project should create trails to connect nearby culdesacs with the amenity center, and street stubs should be provided to adjacent parcels to ensure stronger street network connectivity and multi-modal access as surrounding development occurs. At this time, the proposal appears generally inconsistent with the Regional Plan’s recommendations for new residential development in this area.

Potential Interjurisdictional Impacts

The applicant states that the project would likely affect environmental quality factors identified on the DRI Additional Form, including wetlands and floodplains. The other factors, including water supply watersheds, groundwater recharge areas, protected mountain and river corridors, historic resources, and other environmentally sensitive resources, are projected to remain unaffected. Undisturbed 100-foot buffers between the project and the Mulberry River would be maintained. Wetlands and floodplains would be protected by avoiding disturbance and using best management practices to minimize any impacts. Refer to the attached site plan for stream, flood plain, and buffer locations.

The National Wetland Inventory (NWI) identifies five acres of wetlands onsite and 469 acres of wetlands within one mile of the site. The Northeast Georgia Regional Plan’s Conservation and Development Map (dated 7/19/2018) identifies five acres of “Conservation” land onsite and 468 acres of “Conservation” land within one mile of the site. This “Conservation” land includes zero acres of Regionally Important Resource land onsite and eight acres of RIR land within one mile of the site. No specific Regionally Important Resource sites are identified within one mile of the proposed site.

An estimated 35% of the site would be covered in impervious surfaces, and 13 retention ponds are planned to manage stormwater runoff. The applicant states that the project would, “Avoid stream impacts and protect buffers adjacent to the Mulberry River.” It also states that “Local, state, and federal regulations will be implemented in order to mitigate the impacts on stormwater management.” The site plan proposes buffer areas along the streams and river. The proposal should be designed to minimize disruption to the existing river, streams, associated wetlands, and floodplains to avoid future erosion, flooding, and degraded water quality onsite and downstream from the site. Low impact design measures, like bioswales, rain gardens, and other green infrastructure should be incorporated into the project design, in addition to considering a more compact, clustered, development pattern. At minimum, the project should be in accordance with the latest edition of the Georgia Stormwater Management Manual (Blue Book) and meet all relevant EPD requirements. Given the close proximity to the Mulberry River, it is recommended that the project go above and beyond minimum standards for erosion and stormwater management during and after construction, as opposed to permitting wetland and floodplain disturbance.

Kimley-Horn prepared a traffic study, dated February 2022, that projects 5,322 new daily trips, 422 AM peak hour trips, and 558 PM peak hour trips would be generated. Four entrances are proposed. The traffic study recommends installation of a right-in/right-out entrance on Mulberry Road at Driveway A and three full-movement, un-signalized entrances. The traffic study states that all of the study intersections would operate at an acceptable level of service. However, the lack of nearby destinations and the auto-centric nature of the design guarantees that residents will be dependent on automobiles for all of their travel needs. Given the limited street network in the area, additional development may lead to traffic bottlenecks. Although the transportation network may be able to absorb new trips from individual projects, the cumulative impact of developing in a car-centric manner naturally leads to a level of congestion that even expensive road widenings struggle to solve.

The project would be served by the City of Winder’s water system with an estimated daily demand of 0.159 MGD. The project would be served by the Barrow County wastewater system with an estimated demand of 0.159 MGD. A three mile sewer line extension would be required to serve the site. No water line extension would be necessary. The applicant states that these demands can be covered by existing capacity. The Regional Plan advises against building in locations where new infrastructure would be required because this can create an unsustainable maintenance burden for the local government.

The applicant estimates the project would generate 1,213 tons of solid waste annually and that sufficient landfill capacity exists to handle this waste. No hazardous waste would be generated.

The applicant estimates that the project would be worth approximately \$280 million at build-out in 2028 and generate \$2.3 million in annual local property taxes. The applicant also estimates that the project would generate \$285,000 in annual sales tax. On a per-acre basis, the project would be worth approximately \$860,000 and generate approximately \$7,000 in tax revenue. Prior to approval, the County should measure the life cycle costs of the infrastructure needed to serve this project to ensure that they would not be committing to more maintenance expenses than the new tax revenue can cover.

Comments from Affected Parties

Alan Hood, Airport Safety Data Program Manager, Georgia Department of Transportation

This proposed project is 6.5 miles northwest of the Barrow County Airport (WDR), and is located outside of any FAA approach or departure surfaces, and airport compatible land use areas, and does not appear to impact the airport.

However, if any construction or construction equipment reaches 200' AGL or more, an FAA Form 7460-1 must be submitted to the Federal Aviation Administration. That may be done online at <https://oeaaa.faa.gov>. The FAA must be in receipt of the notification, no later than 120 days prior to construction. The FAA will evaluate the potential impact of the project on protected airspace associated with the airports and advise the proponent if any action is necessary. Thank you for the opportunity to comment on the proposed development.